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7 Attorneys for FRANCIS BURGA;
FRANCIS BURGA AS THE
8 ADMINISTRATOR OF THE
ESTATE OF MARGELUS BURGA
9

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN JOSE DIVISION**

13 UNITED STATES OF AMERICA,

14 Petitioner,

15 v.

16 FRANCIS BURGA; FRANCIS BURGA AS
THE ADMINISTRATOR OF THE ESTATE
17 OF MARGELUS BURGA; and RUSSELL
MANSKY,

18 Respondents.
19

Case No. 18-CV-01633 BLF (SVK)

STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING DATE OF JOINT
SUBMISSION REGARDING
APPOINTMENT OF SPECIAL MASTER

Judge: Honorable Susan van Keulen

21 In the Court's Order Regarding the United States' Motion Challenging Respondents'
22 Assertions of Privilege dated August 16, 2019 (DN 37), the parties were required to meet and
23 confer to reach agreement on certain issues and to make a joint submission to the Court no later
24 than September 13, 2019. The parties have conferred but need more time to prepare a joint
25 submission. Respondents Francis Burga and the Estate of Margelus Burga are in the process of
26 identifying and gathering the documents that the Court ordered produced, which will be produced
27 to the Government. The above Respondents are reviewing the remaining claimed privileged
28 documents to attempt, if possible, to narrow the number of documents that need to be reviewed by

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1 a special master. In addition, the parties are exploring the choice of a special master and anticipate
2 that they will agree on the identification of a special master.

3 Accordingly, for these reasons, the parties request that the joint submission date be
4 continued to October 11, 2019.

5 DATED: August 28, 2019

Respectfully submitted,

SIDEMAN & BANCROFT LLP

By: /s/ Jay R. Weill

Jay R. Weill

Attorneys for FRANCIS BURGA; FRANCIS
BURGA AS THE ADMINISTRATOR OF THE
ESTATE OF MARGELUS BURGA

10 DATED: August 28, 2019

WOOD ROBBINS LLP

By: /s/ Denise Mejlszenkier

Denise Mejlszenkier

Attorneys for Respondent RUSSELL MANSKY

14 DATED: August 28, 2019

RICHARD E. ZUCKERMAN

Principal Deputy Assistant Attorney General

By: /s/ Amy Matchison

Amy Matchison

Trial Attorney, Tax Division

United States Department of Justice

19 Pursuant to stipulation, **IT IS SO ORDERED.**

21 DATED: August 29, 2019



The Honorable Susan van Keulen

United States Magistrate Judge

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ATTESTATION

Pursuant to Civil Local Rule 5.1., I hereby attest that all counsel represented by conformed signatures above have concurred in the filing of this Stipulation.

DATED: August 28, 2019

SIDEMAN & BANCROFT LLP

By: /s/ Jay R. Weill